

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION**

S.T.,

Plaintiff,

v.

CARSON LOOP ESM, LLC d/b/a  
BUDGETEL and SRINIVAS  
BOLLEPALLI,

Defendants.

CIVIL ACTION FILE NO:  
4:24-CV-00225-WMR

**JURY TRIAL DEMANDED**

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**BRIEF IN SUPPORT OF DEFENDANTS' MOTION FOR LEAVE TO FILE  
OUT OF TIME**

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Come now Defendants in the above-referenced action, begging the Court's pardon and requesting leave to file out of time (1) their Response in Opposition to Plaintiff's Motion for Default Judgment (Doc. 7), and (2) their Answer, also addressed in their contemporaneously-filed Motion to Set Aside Default and Response in Opposition to Plaintiff's Motion for Default Judgment. For the reasons set out more fully in the attached Response in Opposition to Plaintiff's Motion for Default Judgment and accompanying Affidavit, which the Defendants hereby incorporate is if fully restated herein, the Defendants respectfully request that leave be granted, that the Response be deemed filed, and that the Court consider same and

deny Plaintiff's motion for default judgment and grant the Defendants' motion for leave to set aside default.

Respectfully submitted this 10<sup>th</sup> day of January, 2025.

**HALL BOOTH SMITH, P.C.**

*/s/ Jacob O'Neal*

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**CERTIFICATE OF SERVICE**

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I hereby certify that I have this day served the following counsel of record in this case with a true and correct copy of the foregoing **BRIEF IN SUPPORT OF DEFENDANTS' MOTION FOR LEAVE TO FILE OUT OF TIME** upon all parties to this matter by depositing a true copy of same in the U.S. Mail, proper postage prepaid, addressed to counsel of record as follows and/or filing said document with the CM/ECF system which will automatically send electronic notification to the following:

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Respectfully submitted this 10<sup>th</sup> day of January , 2025.

**HALL BOOTH SMITH, P.C.**

/s/ Jacob O'Neal  
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